Attorney's Docket No.: 07977-264001 / US4594

REMARKS

Reconsideration and allowance of the above-referenced application are respectfully requested.

5099

Claims 1-9 stand rejected under 35 U.S.C. 112, first paragraph, as allegedly not being supported. However, FIG. 8 shows a heater block 803 and cylindrical rollers 804.

Therefore, "the plurality of cylindrical rollers are provided with a heater" as shown in FIG. 8. The claims have been amended to better emphasize this distinction, and it is respectfully suggested that this does not raise new issues.

Claims 1-9 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Brown in view of the admitted prior art and Mislano.

The rejection apparently alleges that Brown teaches all of the claimed invention except for a ground electrode in contact with each of the plurality of cylindrical rollers, an opposing electrode opposing the ground electrode, and where the flexible substrate is located between the ground electrode and the opposing electrode. The admitted prior art of FIG. 1 shows a ground electrode 108 and an opposing electrode 109 and a flexible substrate 101. The rejection asserts that it would have been obvious to one of skill in the art to modify the Brown apparatus to include the plasma apparatus structure disclosed by the admitted prior art, including a parallel electrode

Attorney's Docket No.: 07977-264001 / US4594

structure. The rejection alleges that this structure would allow for suitable plasma treatment of long substrates.

However, applicants disagree with this contention. The reasoning for this combination that the structure allows for suitable plasma treating, is not properly taught by Brown or the admitted prior art. In fact, this is based only on hindsight not on the teaching of Brown. Nothing in Brown teaches this kind of suitable plasma treatment.

Moreover, the basic structure of the admitted prior art of FIG. 1 is entirely different from the basic structure of Brown. It is not clear how Brown could be modified to achieve this invention in view of the prior art FIG. 1. Moreover, even if Brown were combined with the prior art of FIG. 1, it would still not have the claimed limitation of the "ground electrode in contact with each of the plurality of cylindrical rollers" as defined by the claims. For these reasons, it is respectfully suggested that the rejection is not proper.

In view of the above amendments and remarks, therefore, all of the claims should be in condition for allowance. A formal notice to that effect is respectfully solicited.

Attorney's Docket No.: 07977-264001 / US4594

Please apply any charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

Date: 2 DEC 2002

Scott C. Harris Reg. No. 32,030

PTO Customer No. 20985

Fish & Richardson P.C.

4350 La Jolla Village Drive, Suite 500

5099

San Diego, California 92122 Telephone: (858) 678-5070 Facsimile: (858) 678-5099

10233983.doc

FAX RECEIVED DEC 0 3 2002 **GROUP 1700**

FISH AND RICHARDSON PC

Attorney's Docket No.: 07977-264001 / US4594

VERSION TO SHOW CHANGES MADE

In the Claims:

The claims have been amended as follows.

5099

- 1. (Amended) A film formation apparatus for a flexible substrate, said film formation apparatus comprising:
- at least two rollers for continuously conveying the flexible substrate from one end to the other end;
- a plurality of cylindrical rollers being provided between the one end and the other end along an arc with a radius R;
- a ground electrode in contact with each of the plurality of cylindrical rollers;
 - an opposing electrode opposing the ground electrode;
 - a vacuum chamber;
- an introducing means for introducing a gas into the vacuum chamber;
 - a gas evacuation means; and
- an energy supplying means for supplying an energy to make a plasma from the gas;

wherein the flexible substrate is located between the ground electrode and the opposing electrode,

wherein counter axes of the plurality of cylindrical rollers run parallel to each other,

X 858 5099

Attorney's Docket No.: 07977-264001 / US4594

wherein the substrate is in contact with each of the plurality of cylindrical rollers,

wherein the ground electrode act as a conveyance supporting portion,

wherein [each of] the plurality of cylindrical rollers is provided with a heater.

3. (Amended) A film formation apparatus for a flexible substrate, said film formation apparatus comprising:

at least two rollers for continuously conveying the flexible substrate from one end to the other end;

a plurality of cylindrical rollers being provided between the one end and the other end along an arc with a radius R;

aground electrode in contact with each of the plurality of cylindrical rollers;

an opposing electrode opposing the ground electrode,
wherein the flexible substrate is located between the
ground electrode and the opposing electrode,

wherein center axes of the plurality of cylindrical rollers run parallel to each other,

wherein the substrate is in contact with each of the plurality of cylindrical rollers,

wherein the ground electrode act as a conveyance supporting portion,

5099

Attorney's Docket No.: 07977-264001 / US4594

wherein the plurality of cylindrical rollers is provided with a heater.